

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) CRIMINAL NO. 09-30001-MAP
)
 BENJAMIN HASKELL)

DEFENDANT'S MOTION TO PERMIT TRAVEL TO MEET WITH HIS COUNSEL

(ASSENTED-TO)

Defendant Benjamin Haskell respectfully moves this Court for permission to meet with his counsel in his Boston office on Thursday, April 2, 2009 from 9:00 a.m. to 3:00 p.m., with appropriate allowance for travel.

As grounds for this motion, undersigned counsel states that he wishes to meet with Mr. Haskell in the Boston office of the Federal Defender Office, at 408 Atlantic Avenue, to review extensive discovery. The review would be time consuming, including many hours watching videotaped interviews of defendant conducted by law enforcement officers, materials which have already been reviewed by this counsel. It is important, in the judgment of counsel, for defendant to review these electronically recorded materials (CDs and audio recordings) as soon as practicable and it will require several hours of viewing and listening to complete the effort.

Due to the demands of his other cases, undersigned counsel
regrettably does not have the time to immediately visit defendant

in Springfield, and the consequence would be that an important review of evidence in the case would be delayed. Defendant has already visited undersigned counsel's office, arriving and leaving in the company of his grandmother on March 13, 2009, a visit which was an important attorney/client meeting, and which was, for purposes of supervision, appropriately uneventful with timely notice to Pretrial Services.

Accordingly, undersigned counsel seeks permission from this Court for defendant to travel to his office on Thursday, April 2, in the company of his grandmother who would remain with him at all times while traveling. Undersigned counsel would similarly seek permission from this Court for any further visits.

The government, by AUSA Kevin O'Regan, has no objection to this proposal so long as Haskell is with his grandmother at all times while he is away from the house traveling to and from Boston, and defendant agrees to this condition.

BENJAMIN HASKELL
By his attorney,

/s/ Charles P. McGinty

Charles P. McGinty
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CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on March 31, 2009.

/s/ Charles P. McGinty

Charles P. McGinty